

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,)
)
Plaintiff.)
) Case No. 1:22-CR-1520-003-JB
vs.)
)
ASHLEY THOMPSON)
)
Defendant.)

MOTION TO MODIFY CONDITIONS OF RELEASE

COMES NOW, Defendant, Ashley Thompson, by and through undersigned counsel, respectfully requests this Honorable Court enter a modified order setting conditions of release and in support thereof states the follows:

1. At the detention hearing on December 8, 2023, the Court indicated orally that it would consider releasing Ms. Thompson to a treatment facility and the Court notes show that treatment options were being explored.
2. Ms. Thompson received an acceptance letter from Darrin's place, a treatment facility in NM and is willing and asking to go there for treatment.
3. At the December 8, 2023 hearing and prior to that, the parties discussed the benefits of Ms. Thompson seeking treatment and were in agreement that should an opening become available, it would be in her best interest to receive treatment.
4. The defense respectfully request the Court modify/amend the order setting conditions to reflect that Ms. Thompson be released third-party to her sister-in-

law Crystal Clark so that she can begin treatment on 4/12/24 at Darrin's place.

5. Mindy Pirkovic with US Probation was contacted and continues to recommend detention.
6. Assistant United States Attorney, Timothy Trembley was contacted in regard to this request and does not oppose the relief requested.

WHEREFORE, Defendant, Ashley Thompson, respectfully requests that the Court enter an order setting conditions of release to reflect the above and for what further relief the Court deems just and proper.

Respectfully submitted,
JEDIDIAH J. GLAZENER, ESQ

By: /s/ Jedidiah J. Glazener

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I hereby certify that a true and correct copy of the foregoing pleading sent, via the Court's CM/ECF notification system, to Assistant United States Attorney Timothy Trembley.

/s/ Jedidiah J. Glazener
Jedidiah J. Glazener, Esq.
Attorney for Defendant